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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

QUINN GARRETT LEWIS,

Defendant.

) Case No.

)

) COUNT 1:

) KNOWINGLY ACQUIRING AND
) TRANSPORTING UNLAWFULLY
) TAKEN WILDLIFE

) Vio. of 16 U.S.C. §§ 3372(a)(1) &
) 3373(d)(2)

)

) COUNT 2:

) FALSE RECORD OF WILDLIFE
) INTENDED TO BE SHIPPED IN
) INTERSTATE OR FOREIGN
) COMMERCE

) Vio. of 16 U.S.C. §§ 3372(d)(2) &
) 3373(d)(3)(B)

I N F O R M A T I O N

The United States Attorney charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Wrangell-St. Elias National Park and Preserve (“WRST”), Alaska, was managed by the National Park Service, Department of the Interior.
2. The National Park Service (“NPS”) had the authority to enforce Title 16 of the United States Code within the exterior boundaries of WRST.
3. Hunting is permitted at Sheep Lake in WRST and all hunters are required to follow state and federal regulations. At all times relevant to this Information, the Alaska Department of Fish and Game (“ADFG”) designated Sheep Creek in WRST as being in Unit 11.
4. QUINN GARRETT LEWIS was a resident of Montana in 2014 and never became a resident of Alaska.

RELEVANT LAW AND REGULATIONS

Federal Laws and Regulations

5. The Lacey Act, Title 16, United States Code, § 3372(a)(1) makes it unlawful for any person to transport, receive, or acquire any wildlife taken, possessed, or transported in violation of any law, treaty, or regulation of the United States.
6. The Lacey Act, Title 16, United States Code, § 3372(d)(2) makes it unlawful for any person to make or submit any false record or account for any wildlife which has been, or is intended to be, transported in interstate or foreign commerce.

7. Title 36, Code of Federal Regulations, § 2.2(a)(1) makes it unlawful for any person to take wildlife in a national park, except by authorized hunting activities conducted in accordance with paragraph (b) of this section.
8. Title 36, Code of Federal Regulations, § 2.2(b)(4) requires where hunting is authorized, such activities shall be conducted in accordance with Federal law and the laws of the State within whose exterior boundaries a park area or a portion thereof is located. Non-conflicting State laws (Alaska State Statutes) are adopted as a part of these regulations.

State of Alaska Laws and Regulations

9. Alaska State Statute 16.05.407 requires that nonresident hunters hunting big game animals must be accompanied by a licensed registered/master guide for nonresident hunting of brown bear, goat, and sheep.
10. Alaska State Statute 16.05.420(a) states that a false statement of a material fact in an application for a license, tag, or permit voids the license, tag, or permit for which the application is made.

COUNT 1 **VIOLATION OF THE LACEY ACT**

11. Paragraphs 1 through 10 of this Information are hereby re-alleged in their entirety and incorporated by reference herein.
12. On or about August 10, 2014, within the District of Alaska, and elsewhere, QUINN GARRETT LEWIS did knowingly transport, receive and acquire unlawfully taken and possessed wildlife, to wit, a Dall Sheep in WRST, when

in the exercise of due care, QUINN GARRETT LEWIS should have known that said wildlife was unlawfully taken, possessed, and transported in violation of and in a manner unlawful under the laws and regulations of the United States, in that QUINN GARRETT LEWIS was not a resident of the State of Alaska at the time and had made a false claim of Alaska residency, had illegally obtained a resident Alaska license, and then did illegally take the Dall Sheep in WRST in violation of Alaska State Statutes 16.05.407 and 16.05.420.

All of which is in violation of Title 16, United States Code, Sections 3372(a)(1) and 3373(d)(2).

COUNT 2
FALSE RECORD

13. Paragraphs 1 through 12 of this Information are hereby re-alleged in their entirety and incorporated by reference herein.
14. In October, 2014, in the District of Alaska, QUINN GARRETT LEWIS did knowingly make and submit a false record and account of wildlife, to wit, did make and submit a false hunt record to the State of Alaska Department of Fish and Game for a Dall Sheep, in an offense involving wildlife which was intended to be transported in interstate and foreign commerce, when in the exercise of due care, QUINN GARRETT LEWIS should have known that the hunt record and account he provided to the State of Alaska falsely stated that QUINN GARRETT LEWIS had not hunted a Dall Sheep when in

truth and in fact, as QUINN GARRETT LEWIS then knew, he had illegally taken a Dall Sheep on August 10, 2014.

All of which is in violation of Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(B).

DATED this 1st day of May, 2019, at Anchorage, Alaska.

BRYAN SCHRODER
United States Attorney

s/ Retta-Rae Randall
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United States of America